

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

TAKIA WALTON; DANYLLE)	
MCHARDY; GEORGE DE LA PAZ JR.;)	
KEVIN JACOBS and FEIONA DUPREE,)	
Individually, and on behalf of all others)	
similarly situated,)	CIVIL ACTION FILE NO.
)	1:19-CV-4466-LMM
Plaintiffs,)	
)	
v.)	
)	
PUBLIX SUPERMARKETS, INC,)	
)	
Defendants.)	

DECLARATION OF DEIDRE HARRIS

I, Deidre Harris, pursuant to 28 U.S.C. § 1746, state as follows:

1. The facts in this declaration are based on my personal knowledge.
2. I understand that this declaration may be used as evidence in the above-captioned lawsuit, which concerns the prior classification of the Bakery Manager position at Publix Super Markets, Inc. (“Publix”) as exempt from overtime laws. I understand that because I worked for Publix as a salaried exempt Bakery Department Manager from July 2017 through the position’s reclassification in March 2019, I am part of the proposed group that Plaintiffs, whose names are at the top of this document, seek to include or otherwise represent in this lawsuit. I understand that

whether to join the lawsuit, as well as whether to speak with Publix's counsel and provide this declaration, are my choices to make and that I will not be treated any differently based on my decisions. I have not been pressured in any way in making these decisions. I have no interest in joining the lawsuit, and I provide this declaration voluntarily.

3. I am a Bakery Manager for Publix. I oversee the Bakery Department in Store No. 0033 Deli Department. I began working for Publix in 1998 and worked until approximately 2004. I then started working at Publix again in 2009 and was promoted into my current role as Bakery Manager in July 2017. During my tenure with Publix I also worked as an Assistant Bakery Department Manager.

4. My department contains approximately ten associates whom I supervise. Store No. 0033 is a high volume store and the is the highest volume store in the district.

5. I've also worked in the Bakery Department in Store No. 646 where I supervised approximately 6 or 7 associates. Store No. 646 is a lower volume store. The stores were operated very differently due to their volume and traffic.

6. As Bakery Manager, I am responsible for all of the interpersonal management of my associates. As a Bakery Manager, it is my responsibility to understand every role in my department and fill in wherever I may be needed. I am

proficient in all of the roles I manage including baker, decorator and clerk. I usually don't fill in for the "mixing role" because it is hard for me to handle my managerial duties and also handle mixing. Even when I am handling a specific role, I am managing on the fly. For example, if I am filing in for the clerking role, I am still managing at all times. If I need to, I will stop what I am doing to manage my associates and believe that my managerial role comes first.

7. Every day I have a routine. When I come in for the shift, I look at my "transfers" and handle my bills. When I say "Transfers" I mean that the sub deli department requests that the Bakery department make the bread for the subs. Once the Bakery department finishes baking the bread, as a Manager I need to make sure that the Bakery department correctly accounts for the costs and "bills" the Deli department for the bread. It is my responsibility to ensure that this "accounting" is handled.

8. It is also my responsibility to look at the productivity report and assign my associates to different roles in the department. As a Bakery Manager, I must use my judgment to assign my associates to different roles based on the Bakery's needs. For example, if I know we have twenty hours of decorating tasks, I may assign two or more associates to decorating tasks. On Saturdays, for example, my bakery needs more decorators, so I may pull associates from other roles to fill in as decorators.

9. I like my associates to be cross-trained in all of the roles -- that is the way I like to run my department. It is important that my associates understand each role and be flexible. This is different than my prior store. At my current store, since we are high volume, all of my associates need to be cross-trained, so I can place them in roles as needed.

10. I am heavily involved in the hiring process for my bakery associates. I am always the first line of interviewing. If I like a candidate, I will speak with my Store Manager and recommend who I'd like to hire. The Store Manager usually follows my recommendations for hiring. I also prospect for candidates. I am in charge of reviewing the applications and if I like an application, I will decide on my own if I want to bring an individual in for the interview.

11. I also mentor associates to transition into managerial roles. I am currently training one of my associates now on how to manage. For example, I am showing the associates different reports, such as the profits and losses report, and teaching them the importance of scheduling. When it comes time for a promotion, my store manager asks me for my recommendation for promotions.

12. Sometimes my associates need to be disciplined. If I need to discipline one of my associates, I will take them aside and speak with them. If an issue occurs again then I will write a more formal counseling report. Recently, there was an

argument between two of my associates. One of the associates would not let the argument go. I took the associate aside and counseled her. After I sent the associate back into the bakery, she continued to create an issue in front of the customers. I pulled the associate aside again and told her she needed to go home for the day. The associate tried to go above my head and went to the Assistant Store Manager. The Assistant Store Manager told the associate that I am in charge of the bakery and if I sent the associate home for the day then she must go home.

13. I see the Deli Department Manager at my store every day. The role is very different than the Bakery Department Manager role. The Deli Department Manager in some stores manage multiple sections other than the Deli Counter, which in turn means they manage more associates and more hours of work. For example, at my current store, the Deli Department Manager also manages a cheese department which they do not have at the lower volume stores. As a result, she has more associates and is able spend more of her time on her products and managerial tasks, such as staffing, other than labor. My role in the Bakery is more labor focused.

14. Given my time at multiple locations, I've noticed that managerial roles differ in higher volume stores versus lower volume stores. Each store is different and with higher volume stores, managers spend more time managing their associates to make sure their departments are covered.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 21, 2019.

A handwritten signature in blue ink that reads "Deidre Harris". The signature is written in a cursive style with a horizontal line underneath it.

Deidre Harris